

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**


In re:)	
)	Case No. 11-51667-659
)	Chapter 13
Ann Dolores Mosby,)	
)	Hearing Date: March 28, 2013
Debtor(s).)	Hearing Time: 11:00 am
)	Hearing Location: 7N

**DEBTOR'S COMBINED MOTION TO RETAIN SHARE OF SETTLEMENT
PROCEEDS AND 2012 INCOME TAX REFUNDS**

Comes now Debtor and states:

1. Debtor's share of a settlement from her claim for wrongful discharge against her former employer is \$5,583.34.
2. Debtor has received tax refunds for 2012 in the sum of \$1,200 federal refund and \$775 state refund. The total amount of the settlement and the tax refunds is \$7,558.34.
3. Debtor was terminated from her job with VNA Healthcare on May 23, 2012. Since that date, Debtor has been out of work and without any income into her household other than from the income of her non-filing husband. Debtor was hired at a new job on or about February 28, 2013 at Hospice Advantage. Her hourly wage at the new job will be \$27 per hour, and Debtor expects to work between 30-40 hours per week.
4. Despite Debtor obtaining new employment, Debtor was out of work for 9 months and fell behind in many basic household bills and expenses. Debtor fell behind on her utility bills, medical bills, mortgage payment, the car payment that is being made outside of the plan by her non-filing husband, and is in need of necessary repairs for her other vehicle. The total of all of these expenses is \$8,253. A detailed listing of these expenses will be sent to the Trustee to support this motion.

WHEREFORE, Debtor prays for the court to enter an Order allowing her to retain the combined portion of her settlement and tax refunds totaling \$7,558 in order to pay for the expenses she incurred while she was unemployed which total \$8,253.62; and for such other and further Orders as may be just and proper.


/s/ Charles H. Huber
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CERTIFICATE OF SERVICE

Above signature certifies that a true copy of the foregoing was served on the following either through the Court's ECF system or by ordinary mail on this 1 day of March of 2013 to: John V. LaBarge, Trustee, PO Box 430908, St. Louis, MO 63143; and all creditors per attached list.

Bank of America Mastercard
c/o Calvary Portfolio Services
500 Summit Lake Dr., #400
Valhalla, NY 10595

Citimortgage Inc
Po Box 9438
Gaithersburg, MD 20898

Citimortgage, Inc.
c/o Millsap & Singer, PC
612 Spirit Dr.
St. Louis, MO 63305

Comprehensive Anesthesia
c/o Firstsource Financial
7650 Magna Dr.
Belleville, IL 62223

Credit Acceptance
25505 W 12 Mile
Southfield, MI 48034

Daniel Pyle
2514 Spencer Ave.
St. Louis, MO 63114

Discover Bank
c/o James McNeile
4550 Belleview, 2nd Floor
Kansas City, MO 64111

Discover Fin Svcs Llc
Po Box 15316
Wilmington, DE 19850

Earthlink
c/o NCO Financial Systems
507 Prudential Rd.
Horsham, PA 19044

Enhanced Recovery Co L
8014 Bayberry Rd
Jacksonville, FL 32256

Ffcc-columbus Inc
1550 Old Henderson Rd St
Columbus, OH 43220

Firstsource Fin Soluti
7650 Magna Dr
Belleville, IL 62223

Mid South Cb
1410 Industrial Park Rd
Paris, TN 38242

Midland Credit Mgmt
8875 Aero Dr
San Diego, CA 92123

Midland Funding, LLC
c/o Sara Monks
1000 Camera Ave., #A
St. Louis, MO 63126

MO Department of Revenue
PO Box 475
Jefferson City, MO 65105

Mrsi
2250 E Devon Ave Ste 352
Des Plaines, IL 60018

Pepos Vision
c/o Firstsource Financial
7650 Magna Dr.
Belleville, IL 62223

Sallie Mae
Po Box 9500
Wilkes Barre, PA 18773

SSM Healthcare
PO Box 801776
Kansas City, MO 64180

St. John's Mercy
c/o Firstsource Financial
7650 Magna Dr.
Belleville, IL 62223

St. John's Mercy
PO Box 504655
St. Louis, MO 63150

St. Louis County Collector of Revenue
41 S. Central Ave.
St. Louis, MO 63105

St. Luke's Hospital
PO Box 60974
St. Louis, MO 63160

St. Luke's Hospital
PO Box 60974
St. Louis, MO 63160

West County Radiology
11475 Olde Cabin Road
Suite 200
Creve Coeur, MO 63141

West County Radiology
c/o ARC
PO Box 3860
Chesterfield, MO 63006

Western Anesthesia & Pain Management
339 Consort Dr.
Ballwin, MO 63011

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Las Vegas, NV 89193